

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

YOUNG AMERICA’S FOUNDATION; BINGHAMTON
UNIVERSITY COLLEGE REPUBLICANS; and JOHN LIZAK,
President of the College Republicans of Binghamton University,

Plaintiffs,

Civil Action 3:20-cv-822

v.

HARVEY STENGER, President of SUNY-Binghamton in his
official and individual capacities; BRIAN ROSE, Vice President
of Student Affairs of SUNY-Binghamton, in his official and
individual capacities; JOHN PELLETIER, Chief of
SUNY-Binghamton UPD, in his official and individual
capacities; COLLEGE PROGRESSIVES, a student Organization
at SUNY-Binghamton; PROGRESSIVE LEADERS
OF TOMORROW (“PLOT”); STUDENT ASSOCIATION OF
BINGHAMTON UNIVERSITY,

Defendants.

DEFENDANT, COLLEGE PROGRESSIVES RULE 26(a)(1) INITIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a), Defendant College Progressives hereby serves these Initial Disclosures to Plaintiff. [Appendix A](#) to these disclosures identifies those individuals who may have discoverable information relevant to disputed facts alleged with particularity in the pleadings. [Appendix B](#) to these disclosures describes the documents, data compilations, and tangible things held by Defendant College Progressives that may be relevant to disputed facts alleged with particularity in the pleadings.

There is no insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in this action or to indemnify or reimburse for payments made to satisfy a judgment.

These disclosures do not constitute waiver of any work product protection and are without prejudice to any other issue or argument.

Dated: June 20, 2022

COUNSEL FOR DEFENDANT COLLEGE
PROGRESSIVES

/s/ Peter A. Orville

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APPENDIX A

A. Individuals who may have discoverable information relevant to disputed facts alleged with particularity in the pleadings.

College Progressives is no longer an active organization at Binghamton, and the information I have is that all individuals that were involved with College Progressives are no longer enrolled at Binghamton University and/or have left the Broome County area.

I have contact with only one individual who was involved with College Progressives. Upon information and belief, the organization would have filed information with the Student Association as to the identities of the officers of the organization. I have attempted to research through a Google search the identities of other members of College Progressives, with no results.

The one individual I know of is:

Dheivanai Moorthy phone: 540/834-8770

Address: unknown

Email address: dheivanai@gmail.com

APPENDIX B

B. Description of documents that may be relevant to disputed facts alleged with particularity in the pleadings.

Upon information and belief, after the disbanding of College Progressives at Binghamton University, the College Progressives office was retrieved by the Student Association. Any documents relevant to disputed facts alleged in the pleadings were likely located in what had been the College Progressives office at the University.

Ms. Moorthy has indicated that she has no documents or communications regarding anything relevant to the pleadings.